INDEX.

SUBJECT INDEX

	Page
Motion for leave to file statement as to jurisdiction	1
Statement as to jurisdiction	3
State statute involved	3, 4
Statutory provisions sustaining jurisdiction	4

STATUTES CITED.

Act of the General Assembly of the State of South Carolina passed and ratified on March 9, 1933	3, 4
Judicial Code, Section 237, as amended (U. S. C., Title 28, Sections 344 (a) and (b))	4

SUPREME COURT OF THE UNITED STATES.

OCTOBER TERM, 1933

No. 117

HUNTER A. GIBBES, REPRESENTING HIMSELF AND ALL OTHER DEPOSITORS OF THE CENTRAL UNION BANK OF SOUTH CAROLINA, ETC., APPELLANT,

vs.

SIMPSON J. ZIMMERMAN, INDIVIDUALLY AND AS CONSERVATOR OF THE CENTRAL UNION BANK OF SOUTH CAROLINA, ET AL.

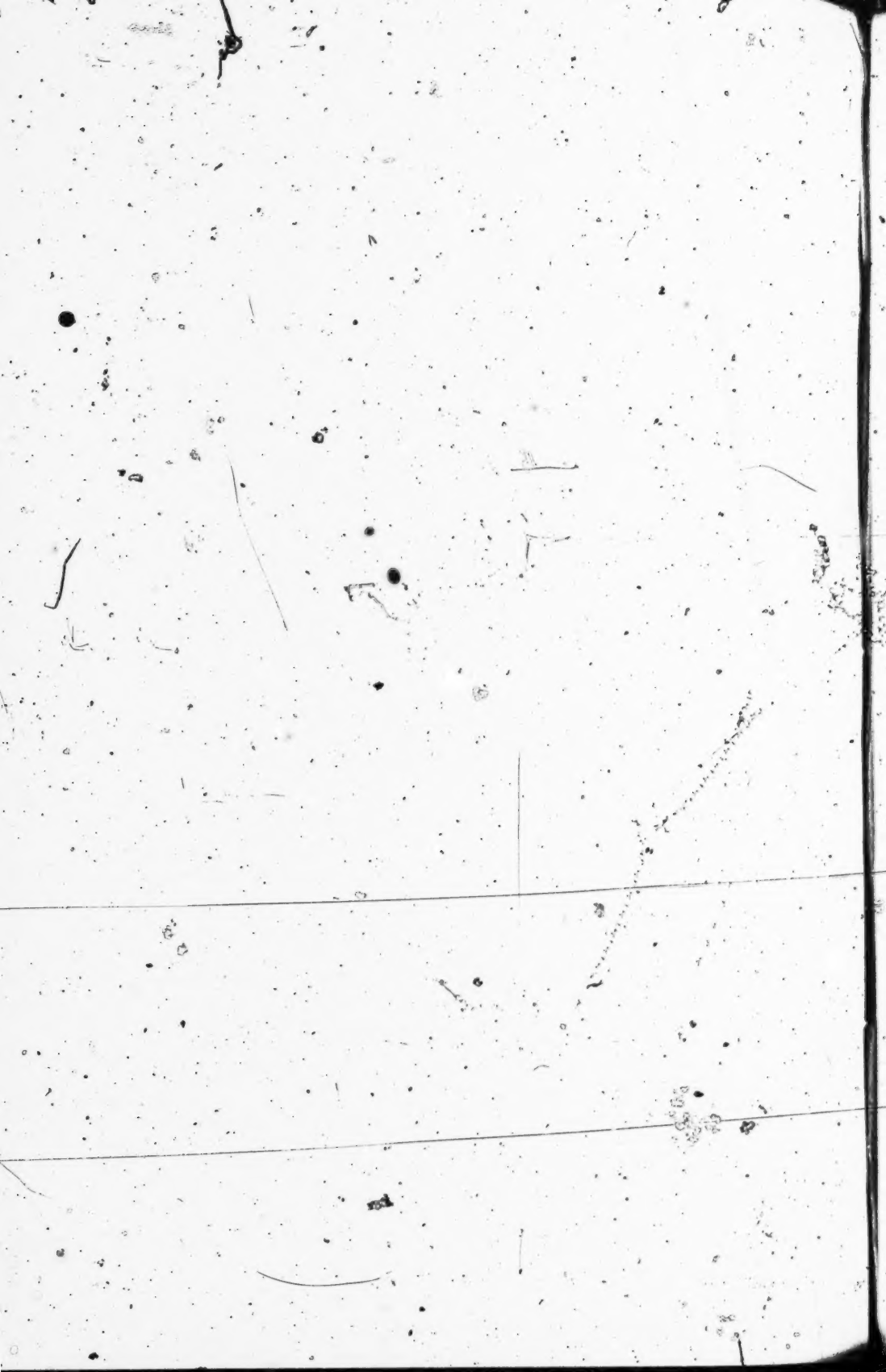
MOTION.

To the Honorable Supreme Court of the United States:

The appellant, Hunter A. Gibbes, respectfully moves this Honorable Court to permit him to file the annexed statement of the basis upon which it is contended that this the Supreme Court of the United States has jurisdiction upon appeal to review the judgment of the Supreme Court of the State of South Carolina in question herein at this time as if presented and served at the time the Petition for Appeal and Assignment of Errors were presented to the Chief Justice of the Supreme Court of South Carolina.

D. W. ROBINSON,
Attorney for Hunter A. Gibbes, Appellant.

May 29, 1933.



SUPREME COURT OF THE UNITED STATES.
OCTOBER TERM, 1933

No. 117

HUNTER A. GIBBES, Representing Himself and All Other Depositors of The Central Union Bank of South Carolina, etc., Appellant,

vs.

SIMPSON J. ZIMMERMAN, Individually and as Conservator of The Central Union Bank of South Carolina, et al.

STATEMENT OF THE BASIS UPON WHICH IT IS CONTENDED THAT THIS THE SUPREME COURT OF THE UNITED STATES HAS JURISDICTION UPON APPEAL TO REVIEW THE JUDGMENT OF THE SUPREME COUFT OF THE STATE OF SOUTH CAROLINA IN QUESTION HEREIN.

To the Honorable Supreme Court of the United States:

The appellant, Hunter A. Gibbes, representing himself and all other depositors of The Central Union Bank of South Carolina similarly situated, would respectfully state to this Honorable Court that he invokes the jurisdiction of the said Court on the appeal from the Supreme Court of the State of South Carolina in this case upon the basis:

The Act of the General Assembly of the State of South Carolina passed and ratified on March 9, 1933,

entitled "A bill to authorize and direct the Governor of the State of South Carolina to assume plenary control of the State Banking Department and of all banks, banking institutions, building and loan associations, cash depositories or other institutions doing a banking business of whatever nature, and to make, issue and promulgate such rules, regulations and/or instructions as may be necessary to direct, control and protect such banks, banking institutions, building and loan associations and cash depositories and depositors and to provide penalties for violation of such rules and regulations, and to regulate litigation in reference thereto, and to authorize the establishment or incorporation of a State Clearing House Association if necessary", as the said Act is construed and interpreted by the decision of the Supreme Court of the State of South Carolina, takes from the appellant, Hunter A. Gibbes, his property and property rights without compensation and without due process of law; and the said Act, as construed by said decision of the Supreme Court of the State of South Carolina, impairs the contractual rights of Hunter A. Gibbes, all in violation of the Constitution of the United States.

The jurisdiction of this the Supreme Court of the United States is invoked for the foregoing reasons under the provisions of Section 237 of the Judicial Code of the United States as amended. U. S. C. A., Title 28, Sec. 344 (*a*) and (*b*).

D. W. ROBINSON,
Attorney for Appellant, Hunter A Gibbes.